

EXHIBIT B

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

COPY

In re:) Chapter 11
INACOM CORP., et al.,) Case No. 00-2426 (PJW)
Debtors.) Jointly Administered

INACOM CORP.,) Civil Action No.
On behalf of all affiliated) 04-582 (GMS)
Debtors,)
Plaintiffs,)
V.) Adv. Pro. No.
DELL COMPUTER CORPORATION,) 02-03499 (PJW)
Et al.,)
Defendants.)

ORAL DEPOSITION OF

JOHN LaROCCA

JULY 14, 2005

ORAL DEPOSITION of JOHN LaROCCA, produced as a witness at the instance of the Plaintiffs, and duly sworn, was taken in the above-styled and numbered cause on the 14th day of July, 2005, from 9:35 a.m. to 5:09 p.m., before David Bateman, RPR, CSR in and for the State of Texas, reported by machine shorthand, at the offices of Hughes & Luce, LLP, 111 Congress Avenue, Suite 900, Austin, Texas 78701, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

A P P E A R A N C E S

FOR THE PLAINTIFFS:

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FOR THE DEFENDANT DELL COMPUTER CORPORATION:

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ALSO PRESENT:

MR. STUART GOLLIN (Via Telephone)
Weiser, LLP

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1 JOHN LaROCCA,
2 having been first duly sworn, testified as follows:

3 EXAMINATION

4 BY MR. FORTE:

5 Q Mr. LaRocca, have you given a deposition
6 before?

7 A I have.

8 Q Do you understand the basic procedure?

9 A I believe so.

10 Q All right. Well, let's go over a few points
11 just to make sure.

12 The court reporter who's sitting at the
13 table will be taking down everything that's said, which
14 means you should try as best you can to speak audibly
15 and not use nods of the head or "uh-huh" or "huh-uh"
16 because the court reporter cannot get that down.

17 Do you understand?

18 A Yes.

19 Q Also, the court reporter can only take down
20 one person speaking at a time. So I'll try not to
21 interrupt you and you try not to interrupt me. Is that
22 acceptable?

23 A Yes.

24 Q And your counsel, Ms. Streusand, who is here
25 today may occasionally interpose an objection. If she

1 does that, just please wait for her to finish. And
2 then you can either continue to answer the question or
3 ask for it to be repeated.

4 If at any time you don't understand my
5 question, I am occasionally known to ask inartful
6 questions. Just say you don't understand and I'll try
7 to rephrase it or I'll have the court reporter read it
8 back to you.

9 You understand you're under penalty of
10 perjury today just as if you were in a courtroom? Do
11 you understand that?

12 A Yes.

13 Q All right. And is there any reason that
14 you're aware of why you cannot proceed with your
15 deposition today?

16 A No.

17 Q Could you please state your full name and home
18 address for the record, sir.

19 A John LaRocca, 13371 East Sorrel Lane,
20 Scottsdale, Arizona 85259.

21 Q Do you intend to reside in Scottsdale for the
22 indefinite future, sir?

23 A Yes.

24 Q And what's your current business address?

25 A The same.

1 Q Do you work out of your house?

2 A I do.

3 Q My name is Earl Forte. I work for the law
4 firm of Blank Rome and we represent the plaintiff in
5 this matter, Executive Sounding Board Associates, Inc.,
6 which is the plan administrator under the InaCom
7 liquidating plan.

8 We are representing the interests of the
9 Debtor InaCom Corp. and affiliates as the plaintiff in
10 this preference action against Dell.

11 And when I say "Dell," just to clarify,
12 Dell Computer -- excuse me -- Dell, Inc., formerly
13 known as Dell Computer Corporation, Dell Receivables,
14 LP and Dell Marketing, LP have appeared in the case as
15 defendants.

16 And I will refer to all of them together
17 as Dell for purposes of today. Do you understand that?

18 A Yes.

19 Q Thank you. What is your basic understanding,
20 Mr. LaRocca, of the nature of this case?

21 A That it's a preference action for the purpose
22 of determining if the receivables collected during the
23 preference period were collected under normal ordinary
24 course or not.

25 Q Are you aware of what defenses Dell is

1 A I was a policy issue manager for Occidental
2 Life Insurance, part of TransAmerica, for two years
3 from '67 to '69, mid of each of those years. I was a
4 credit manager for Household Finance, assistant credit
5 manager from 1969 to 1970.

6 I was an assistant credit manager for
7 Bayuk, B-A-Y-U-K, Cigars from 1970 through 1972. And I
8 was a credit and sales manager for Furniture Town from
9 1972 to 1974.

10 In 1974, I was hired by the
11 Hewlett-Packard Company as a credit specialist. And
12 when I left my studies at LaSalle, it was because I was
13 promoted to move to Washington, DC to run the Eastern
14 United States Leasing and Contracts Administration
15 organization for the Hewlett-Packard Company.

16 Q Okay. When did you get your certificate from
17 the Kellogg School?

18 A I believe that was April of 1977.

19 Q While you were at HP?

20 A That's correct.

21 Q And it states in your report that you have
22 training in credit analysis at Dun & Bradstreet.

23 A That's true.

24 Q Can you describe for me what that involved?

25 A That was a one-year correspondence course.

1 Q And what was the subject area of that?

2 A Financial statement analysis.

3 Q Financial state?

4 A Statement.

5 Q Statement analysis?

6 A Analysis.

7 Q Balance sheets, profit and loss statements,
8 things of that nature?

9 A That's correct.

10 Q And you said you engaged in that program for
11 one year?

12 A That's right.

13 Q Where did that physically take place?

14 A I was at Hewlett-Packard and my offices were
15 in Cupertino, California.

16 Q So you did it from Cupertino?

17 A Yes.

18 Q Your report also states that you have training
19 in credit collection management for Household Finance
20 Company and you briefly mentioned that today.

21 Can you describe for me what kind of
22 training that was?

23 A That was a one-year program which I completed
24 in five months. At the time, I was the -- the
25 shortest-term successful candidate for their management

1 training program.

2 Q Okay. And could you describe what the program
3 entailed?

4 A The program entailed consumer credit
5 evaluation, setting credit authorization limits,
6 approving loans, collecting loans, administering
7 delinquency.

8 Q What kind of loans?

9 A Consumer loans.

10 Q Were those mortgages or other kinds of loans?

11 A Other kinds, auto loans, personal loans,
12 signature loans, some collateralized, some not
13 collateralized.

14 Q Now you also state in your report that you
15 have training in financial statement analysis from
16 Robert Morris Associates.

17 A That's correct.

18 Q Excuse me. Before we get to that, what were
19 the dates of your training at Household Finance Corp.?

20 A That would have been the year 1969 through the
21 spring of 1970, so the fall of '69 through the spring
22 of '70.

23 Q All right. Now let's get back to Robert
24 Morris Associates. Could you describe for me the
25 training that you had there in finance statement

1 analysis, please?

2 A Yes. Robert Morris Associates trains all the
3 banks in the United States. That's the -- they're in
4 Philadelphia. They're the standard for training
5 bankers on how to lend money.

6 They did not typically train commercial
7 industrial credit organizations. I contracted them
8 proactively in the mid-90s when the banks or -- excuse
9 me -- in the late '80s and mid-90s when the banks began
10 to default my customers.

11 So I was the first company to contract
12 with Robert Morris to come in and train myself and my
13 staff on how banks thought so that we could better
14 understand how banks made decisions and anticipate
15 problems that only bankers could cause.

16 Q Okay. What were the dates of your training at
17 Robert Morris?

18 MS. STREUSAND: Approximately is fine.

19 A I'm going to have to tell you approximately.

20 Q (BY MR. FORTE) That's fine.

21 A It would have been the 1993-to-1994 time
22 frame.

23 Q Now you also state in your report that you
24 have training in quality management by Rummler-Brache
25 and Hewlett-Packard. Starting with Rummler-Brache, can

1 you describe for me what that quality management
2 program was?

3 A Yes. It's -- it's looking at a process from
4 the way it is and then creating the way it should be.
5 It's every step in the evolution of a business process.
6 And that is now part of Kempner Trego, probably a more
7 familiar name.

8 Rummler-Brache was acquired by them. And
9 that's probably one of the highest standard groups for
10 quality training in the commercial industrial space,
11 company training.

12 Q Well, did your training in quality management
13 focus on a particular area?

14 A Critical thinking and process management
15 methodology. It was a program that went into many
16 different vernaculars. It wasn't specific to credit
17 and collections.

18 It was specific to a comprehensive
19 business process, regardless of what the discipline
20 was.

21 Q Was it a theoretical course? ..

22 A Yes.

23 Q What were the dates of that?

24 A Again, that was probably 1995.

25 Q That -- that stopped and started within a

1 calendar year?

2 A Yes. That was -- that program lasted less
3 than one month in duration.

4 Q Now you also did some training in team
5 development with Bentonville Associates.

6 A That's correct.

7 Q What was that?

8 A Bentonville Associates is on the location of
9 the Wal-Mart Company. In 1997, I switched career
10 positions in HP and moved from credit back into a sales
11 and marketing responsibility for the global
12 responsibility for the Pinacor account for
13 Hewlett-Packard.

14 Bentonville Associates facilitated
15 training on how to manage global accounts, building
16 effective relationships at executive levels. And that
17 was an on-site program in Fayetteville, Arkansas. It
18 was one week in duration.

19 Q And what year was that? You said '97?

20 A 19 -- that was 1997.

21 Q All right. Have you described to me all of
22 your formal training as a professional aside from job
23 experience?

24 A At Hewlett-Packard, in order to maintain
25 yourself from a current standpoint in business

1 processes, HP required each year that you would
2 participate in no less than two structured training
3 programs either externally or internally to
4 Hewlett-Packard.

5 I was with HP for 22 years.. Deductively,
6 I participated in probably 40, give or take, different
7 training programs from the salary administration
8 through different process managements and how to
9 effectively communicate with people, how to give
10 presentations, I mean, the normal course of improving
11 and maintaining one's self as a corporate citizen.

12 Q Have you had any formal training in law or
13 preference law, specifically?

14 A I've had two business law courses in college.
15 And I've attended seminars and presentations put on by
16 bankruptcy attorneys.

17 Q Do you recall the principal textbook you used
18 in your business law courses in college?

19 A I do not.

20 MS. STREUSAND: Mr. Forte, do you?

21 MR. FORTE: I didn't take it.

22 MS. STREUSAND: You didn't take it?

23 MR. FORTE: But every -- but everybody in
24 the Warden School took it. And there was a famous
25 textbook that was used all over the country. I can't

1 Q -- and Jacom. And that's all, correct?

2 A That's right.

3 Q So there's no data from any of the other
4 resellers you've mentioned?

5 A No. All the ones I mentioned were predicated
6 on my years of experience with them and my intimate
7 knowledge of their payment habits.

8 Q Have you identified for me all of the computer
9 manufacturers and resellers that you've considered in
10 connection with rendering your opinion?

11 A I rendered my opinion based on my experience.
12 The examples I gave were examples of companies that I
13 would look, as a credit manager, comparative to InaCom
14 from my experience.

15 There were others, but these were of a
16 size and I had enough of a personal relationship with
17 each one of those to look at them comparatively to my
18 personal experience with InaCom.

19 Q Now in your report in paragraph four, you've
20 outlined your employment background. And I believe
21 we've reviewed most of that but I don't think all of
22 it.

23 And you state several times in here you
24 were employed at Hewlett-Packard for 22 years. And I'd
25 like to go through each position you had at HP with a

1 little more detail.

2 A Okay.

3 Q Now you state in your report that, for three
4 years, you were the Eastern U.S. Regional Leasing and
5 Contract Manager for HP; is that correct?

6 A Yes.

7 Q What were the dates of that position?

8 A August of 1977 through August of 1980.

9 Q And what were your job duties and
10 responsibilities in that position for HP?

11 A To provide sales support in the form of
12 negotiating volume purchase agreements, value-added
13 reseller purchase agreements, offering leasing -- lease
14 finance terms for all product lines of Hewlett-Packard
15 overwhelmingly computer products, negotiating the
16 contracts that I mentioned a moment ago for all
17 disciplines of Hewlett-Packard.

18 Overwhelmingly, over 85 percent was in
19 computer products. But HP was in seven businesses at
20 the time.

21 MR. FORTE: Excuse me.

22 THE WITNESS: God bless you.

23 Q (BY MR. FORTE) Were you involved in setting
24 invoice payment terms?

25 A I was involved in enforcing invoice payment

1 right?

2 MR. FORTE: Yes. And keep it on mute
3 because, otherwise, there's this blowing sound that's
4 distracting.

5 MR. GOLLIN: Okay. I -- I will call you
6 back in. I'm going to get off and call you back in.

7 MR. FORTE: Thank you.

8 MR. GOLLIN: Okay.

9 Q (BY MR. FORTE) All right. Now after you were
10 in commercial sales at HP for one year -- and I assume
11 that was in 1980 and 1981.

12 A That's right. It was from the summer of '80
13 through the spring of '81.

14 Q You spent two years in computer lease
15 marketing; is that correct?

16 A And contracts, yes.

17 Q What did that involve?

18 A I was the global leasing manager for the
19 Hewlett-Packard computer business in Cupertino,
20 California. And it involved recruiting and training
21 sales finance and contract representatives in North
22 America, Canada and Western Europe.

23 Q And I assume, when you say global, you mean
24 worldwide.

25 A Yes.

1 Q Okay.

2 A At that -- at that time, the overwhelming
3 business was North America and Western Europe. It's
4 since changed. But this was a worldwide or global
5 position. But the focus of my activity were on those
6 two geographies.

7 Q And then you spent 12 years in Global American
8 Credit Management; is that right?

9 A Well, I left Hewlett-Packard for two years.
10 When I came back, I came back as a Hewlett-Packard
11 senior credit manager with different titles for years.

12 (Brief recess)

13 Q (BY MR. FORTE) You just stated before the
14 short break, Mr. LaRocca, that you left Hewlett-Packard
15 for two years. What did you do during the two years?

16 A I was recruited by a company called Phoenix
17 Leasing in Mill Valley, Marin County, California as
18 vice-president of lease marketing for private-label
19 manufacturer leasing program sales.

20 Q What kind of gear was involved?

21 A Primarily computer but also telecom and
22 medical and fabrication equipment.

23 Q Did you leave Hewlett-Packard on good terms?

24 A Yes. I was recruited back. I was asked not
25 to leave twice.

1 Q And you came back and were there for 12 more
2 years?

3 A I was there for 13 more years, 12 in credit.

4 Q What was the one year?

5 A The last year I became the global or worldwide
6 relationship sales marketing manager for the
7 MicroAge/Pinacor relationship in Phoenix, Arizona,
8 Tempe, Arizona for Hewlett-Packard.

9 Q And could you describe for me your duties and
10 responsibilities in the 12-year job at HP that you just
11 mentioned?

12 A My responsibilities were for enforcing credit
13 terms, extending credit, customer relationships,
14 collecting money, applying cash, forecasting cash
15 availability so the treasurer wouldn't have to borrow
16 it, and building systems and tools to anticipate the
17 growth requirements of a multinational credit
18 organization.

19 Q Did you interface with resellers in that job?

20 A Although my responsibility was companywide for
21 all business units, on average, 75 percent of my time
22 was spent in the domestic and international commercial
23 reseller computer channel.

24 The reason for that is that, when you
25 look at HP's annual report for the last better part of

1 a decade, companies -- public companies are required to
2 report concentrations of credit risk. Our
3 concentrations of credit facilities was the highest in
4 the commercial reseller channel.

5 And our concentrations of risk was the
6 highest in the commercial channel. So I spent a
7 proportionate amount of my time, which was
8 three-quarters of it, managing those relationships.

9 Q And you worked at Hewlett-Packard until 1997;
10 is that correct?

11 A As the credit manager. I worked at
12 Hewlett-Packard until 1998, April the 30th.

13 Q Okay. So the year 1997 to 1998, you were a
14 head of the MicroAge/Pinacor relationship?

15 A That's correct.

16 Q And that's what you were doing exclusively at
17 that time?

18 A Overwhelmingly. I was still being -- helping
19 in the transition of the credit organization. I was
20 called back by the treasurer on a number of occasions
21 and by customers. But I was being paid to be the sales
22 manager for the MicroAge/Pinacor relationship.

23 Q Were you in Cupertino at the time you left
24 Hewlett-Packard?

25 A No. I was at -- my office was in Phoenix,

1 Arizona.

2 Q You moved to Phoenix for that last year?

3 A I did, but I already had a home there. So I'm
4 a California/Arizona resident. But I -- I physically
5 moved my family there. They started -- my kids went to
6 school in Arizona that year.

7 Q All right. Why did you leave Hewlett-Packard?

8 A I was recruited by Tokai Financial Services.
9 From August of 1997, their ambition was to take Tokai
10 public. And in March of 1998, they sent me an offer
11 that I couldn't refuse.

12 And it gave me the opportunity to return
13 back to Philadelphia, where the majority of my family
14 resides. So it was very attractive.

15 Q What was the business of Tokai at that time?

16 A It -- at the time, it was predominantly a
17 small-ticket, private-label lessor for manufacturers
18 and resellers of computer technology and computer
19 peripheral equipment, such as printers, overwhelmingly
20 for offshore manufacturers but not exclusively,
21 predominantly Japanese manufacturing companies.

22 Q Was Tokai a Japanese-owned company?

23 A It was.

24 Q And what exactly was your title at Tokai?

25 A Initially when I was recruited, I was

1 vice-president of operations for the small business --
2 of the small-ticket leasing business unit.

3 Almost immediately upon my arrival, I was
4 asked to participate with the CIO because there was
5 expense management and delivery management problems in
6 building new generations of computer systems. Within
7 60 days, my job functions changed.

8 And 90 days after I started, I was
9 promoted to senior vice-president of information
10 systems and operations and the CIO was part of my
11 staff.

12 Q What was your -- what were your job duties as
13 senior vice-president?

14 MR. GOLLIN: Hi, this is Stu. I'm back
15 again.

16 MR. FORTE: Okay. Thanks, Stuart.

17 MR. GOLLIN: I'm going on mute.

18 MR. FORTE: Okay.

19 A My job duties were the operational
20 relationships between the sales organization and the
21 customers from every aspect from the initial
22 application for a lease through the process review,
23 credit approval, booking of that lease up to, but not
24 including, the funding of the transaction -- that was
25 taken care of by the controllership -- and then the

1 management of the lease transaction through the life of
2 the lease, its two-three-four- to five-year term, the
3 collections, and then the renewal of leases or the
4 re-marketing of off-rent equipment.

5 In addition to those responsibilities --
6 that's what my responsibilities when I joined Tokai
7 were -- was added the responsibilities of quality and
8 information systems to get us to the point where we
9 would be positioned for an IPO.

10 Q (BY MR. FORTE) An initial public offering, for
11 the record?

12 A Yes. There was perceived to be large
13 deficiencies in the operational integrity of the
14 organization by the underwriters of the anticipated
15 IPO. And that's why I was recruited or why my position
16 was put out there and I was the person they recruited
17 to fill that position.

18 Q What were the deficiencies?

19 MS. STREUSAND: At Tokai?

20 MR. FORTE: Yeah.

21 A As the chairman from Japan, when he
22 interviewed me after my 60th day there, said to me --
23 and this sums it up very well. I think at Tokai we can
24 sell anything and manage very little.

25 And that was a direct quote. And I --

1 and if I briefly expound on that, is that we were very
2 good at marketing, convincing manufacturers and
3 resellers that they should do business with Tokai. But
4 there was not a integrated process of what expectations
5 did you set for the customer and what could you
6 deliver.

7 And my role was to explain to customers
8 and to the sales organization that we could do
9 anything, but we couldn't do everything, that we needed
10 to define a contiguous process that could be measured
11 and reported on to increase customer satisfaction and
12 make the underwriters satisfied that they could take
13 the IPO forward.

14 Q (BY MR. FORTE) Did the IPO ever occur?

15 A It did not. In November of the year that I
16 worked for them, November of 1998, Don Campbell was
17 asked at Thanksgiving to go to Nagoya, Japan to the
18 headquarters of the parent bank, Tokai bank.

19 He was told, but he was not able to share
20 it with us until the business day after Christmas with
21 the executive committee, which I was a member of,
22 five-person executive committee, that the Japanese had
23 determined, after further evaluation that, if they did
24 an IPO, they could raise X dollars.

25 But if they sold the company, they could

1 you've just described, did you begin working again?

2 A I was recruited by Allied Signal. I think the
3 words of their treasurer were "you're too young to be
4 retired." I wasn't retired. I needed a job.

5 Allied Signal was merging with Honeywell
6 and they had overlapping treasury operations, credit
7 and collections operations. I was recruited with one
8 other person, another consultant, to help them
9 efficientize their treasury services and credit
10 collections on a global basis.

11 Q How long were you paid by De Lage Landen after
12 you left?

13 A Well, I was paid immediately at my choice for
14 the next three years.

15 Q So until about 2002?

16 A Yes.

17 Q Were you hired as an employee of Allied
18 Signal?

19 A No, consultant.

20 Q Consultant? And what was the purpose of your
21 consulting?

22 A It was to facilitate review of their
23 overlapping business activities between Allied Signal
24 and Honeywell and help them come to the best decisions
25 possible to efficiently merge those two organizations.

1 The objective was to save 10 million
2 dollars over a 24-month period. I was only engaged for
3 90 to 120 days. They exceeded that 10 million dollars
4 anticipated savings.

5 Q Okay. So you were in that consulting position
6 with Allied Signal for 90 to 120 days?

7 A Yes, sir.

8 Q That was in?

9 A October through January -- October of '99
10 through January -- no, excuse me. I said '99. Yeah.
11 Just getting my dates right.

12 MS. STREUSAND: I think you can
13 approximate.

14 A Yeah. October '99 through January 2000.

15 Q (BY MR. FORTE) And what did you do after you
16 finished the consulting work with Allied Signal and
17 Honeywell?

18 A As I was wrapping that up, I received a call
19 from Gateway Computers. And they had been a company
20 that sold specifically to consumers and now were
21 getting into the commercial reseller channel
22 distribution business and didn't know how to do it.

23 Instead of extending two and \$10,000
24 credit facilities, they were now being asked to extend
25 five million and \$10 million credit facilities. And

1 there was disconnects between their selling
2 organization and their credit organization had no
3 experience.

4 I was contracted to go do an on-site
5 review of their -- at their headquarters in South
6 Dakota of their current business practices and make
7 recommendations and which resulted in creating a
8 commercial credit policy for Gateway Computers.

9 And that was done from December of '99, I
10 was engaged, until it was completed at the end of March
11 of 2000.

12 Q All right. Did you go from the Gateway
13 consulting job to LeasingX?

14 A I did.

15 Q What did you do at LeasingX?

16 A I was again consulted in April of 2000 by
17 Gateway Computer. They were involved in evaluating a
18 start-up company by the name of LeasingX and looking to
19 put a financial investment in LeasingX.

20 LeasingX was purported -- it was started
21 in fall of 1990 -- fall of 1999. And their ambition
22 was to create a commercial auction platform for
23 computer equipment leases.

24 Before Gateway would invest in it, they
25 asked me to go to New York and evaluate the business

1 plan of the principals and talk to the principals and
2 give them my opinion. I did that and I met with them
3 in April.

4 In fact, I met with them at 30th Street
5 Station, Philadelphia in my initial meeting. And
6 through April and early May, I gave Gateway a written
7 report on my opinion.

8 At the end of May, Gateway came back,
9 along with the people at LeasingX, and said, "We'd like
10 to offer you the position of vice-president of
11 operations for LeasingX," which I accepted.

12 And on or about the 1st of July, they
13 offered me the president position for LeasingX, which I
14 accepted. And I stayed in that capacity through
15 January 1st of 2001.

16 Q Why did you leave LeasingX?

17 A They ran out of money. They ran out of it
18 before I left, but the impact of the devastation that
19 took place on 9/11 stopped -- as I talked to a VP of
20 sales for Hewlett-Packard in November, he said, "John,
21 if we didn't have orders to replenish data centers that
22 were destroyed in New York City, we would have
23 absolutely no orders for computer systems as I'm
24 talking to you today. Nobody's buying anything."

25 And the order flow went away. And it was

1 modestly financed through venture capitalists. And the
2 payment stopped, so I gave my notice and I left.

3 Q And starting in 2001, you started working with
4 Quote To Cash Solutions; is that correct?

5 A Yes. Three other gentlemen and myself started
6 Quote To Cash Consulting, which is now called Quote To
7 Cash Solutions.

8 Q For the record, what is the business of Quote
9 To Cash Solutions?

10 THE WITNESS: I'm 56 years old. Would
11 you mind if I read it, because I could leave something
12 out?

13 MR. FORTE: All right.

14 THE WITNESS: This will -- I thought
15 about it last night how I could concisely say this.

16 MR. FORTE: Okay. Just to let the record
17 reflect, the witness is reading from a piece of paper
18 he has pulled out of his pocket.

19 A Quote To Cash Solutions focuses on delivering
20 quality solutions that improve companies' and financial
21 institutions' cash flows, operational efficiency,
22 customer retention and satisfaction.

23 Each Q2C practitioner brings more than 25
24 years global, financial and credit process management
25 experience in a variety of industries. As senior

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

 In re:) Chapter 11
)
 INACOM CORP., et al.,) Case No. 00-2426 (PJW)
)
 Debtors.) Jointly Administered
)
 -----)
)
 INACOM CORP.,)
) Civil Action No.
 On behalf of all affiliated) 04-582 (GMS)
 Debtors,)
 Plaintiffs,)
)
 V.) Adv. Pro. No.
) 02-03499 (PJW)
 DELL COMPUTER CORPORATION,)
 Et al.,)
 Defendants.)
 -----)

REPORTER'S CERTIFICATE OF FILING

ORAL DEPOSITION OF

JOHN LaROCCA

TAKEN JULY 14, 2005

I, DAVID BATEMAN, Certified Shorthand Reporter
 for the State of Texas, hereby certify to the
 following:

That the witness, JOHN LaROCCA, was duly sworn
 by the officer and that the transcript of the oral

1 deposition is a true record of the testimony given by
2 the witness;

3 That the deposition transcript was submitted
4 on _____, 2005 to Ms. Sabrina Streusand, attorney
5 for Defendant Dell Computer Corporation, for
6 examination, signature and return to
7 _____ by _____, 2005;

8 That \$_____ is the deposition officer's
9 charges to Plaintiff, Executive Sounding Board
10 Associates, Inc. on behalf of Debtors, for preparing
11 the original deposition transcript and any copies of
12 the exhibits;

13 That pursuant to information given to the
14 deposition officer at the time said testimony was
15 taken, the following includes counsel for all parties
16 of record:

17 FOR THE PLAINTIFFS:

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1 I further certify that I am neither counsel
2 for, related to, nor employed by any of the parties or
3 attorneys in the action in which this proceeding was
4 taken, and further that I am not financially or
5 otherwise interested in the outcome of the action.

6 Certified to by me this 20th day of July,
7 2005.

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11
12
13 

14 David Bateman, RPR, Texas CSR #7578
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